

# EXHIBIT 15

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE**

PARAGON COMPONENT SYSTEMS, LLC,	)	JUDGE CHARLES E. ATCHLEY, JR.
	)	
Plaintiff,	)	
v.	)	CIVIL ACTION NO.:
	)	1:24-CV-00246-CEA-CHS
QUALTIM, INC., et al.	)	
	)	<b>DECLARATION OF KIRK</b>
Defendants.	)	<b>GRUNDAHL IN SUPPORT OF</b>
	)	<b>INSPIRED PURSUITS, LLC and</b>
	)	<b>QUALTIM, INC.</b>

I, Kirk Grundahl, being duly sworn, hereby affirm as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration pursuant to 28 U.S.C. § 1746. I have personal knowledge of the matters testified to herein.

2. I am a resident of Wisconsin and reside at 1130 Fairway Court, Lake Mills, Wisconsin, 53551, which is in Jefferson County. I have maintained that residence since 2018 and lived in Wisconsin for 65 out of 68 years.

3. I am a member of Inspired Pursuits, LLC (“IP-LLC”).

4. IP-LLC is a limited liability company organized in Texas in 2017. It was later re-organized, registered, and domiciled in Wisconsin in 2022 (Exhibit 16, a true and correct copy is attached – subject to motion to seal to be filed with the Court).

5. None of IP-LLC’s members reside in Tennessee.

6. IP-LLC has never marketed or advertised in Tennessee.

7. IP-LLC has never had an office in Tennessee.

8. IP-LLC has never maintained any bank accounts in Tennessee.

9. IP-LLC has never had any clients in Tennessee.

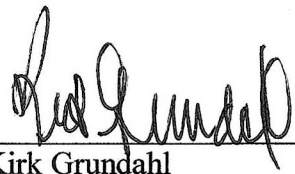
10. IP-LLC has no employees; therefore no employees have ever traveled to Tennessee.
11. I am the President of Qualtim, Inc. (“Qualtim”), President of DrJ Engineering, LLC (“DrJ”) and member and manager of Center for Building Innovation, LLC (“CBI”).
12. Suzanne Grundahl (“Suzi”), Daniel Holland (“Dan”) and I founded IP-LLC first in Texas in 2017 and again in Wisconsin in 2022. (Exhibit 16.)
13. At the time IP-LLC was founded, Dan was a resident of Mississippi.
14. I have known Dan since 1999. He was a truss manufacturer. I am an engineer. From around 2009 to his untimely death on January 17, 2024, we continuously collaborated on many structural component engineering, manufacturing, software and innovative product trade secrets.
15. Dan owned Clearspan Components, Inc. (“CCI”), defined as a truss manufacturer and structural building component manufacturer, not an engineering company.
16. In 2009, CCI purchased software from CompuTrus. This purchase spearheaded the vision that Dan and I share to combine our professional engineering and structural component manufacturing expertise. This became a highly confidential collaboration between Qualtim, DrJ, CBI and CCI, which ultimately resulted in the formation of IP-LLC, first in Texas in 2017, and from 2022 to present in the state of Wisconsin (Exhibit 16).
17. Dan and I understood and agreed that we were in a 50/50 joint venture with respect to using our industry trade secrets to develop valuable engineering, manufacturing and innovative product intellectual property. Our partnership began in earnest in 2009, where we began the development of engineering software that would be utilized by Qualtim and later DrJ to sign and seal structural building components manufactured by Dan’s company, CCI. Starting in 2009, our early thinking, given the 50/50 partnership, was to memorialize this by discounting our invoices by 50%, where a note was included on the invoice stating “Qualtim’s Share” because we understood our work to develop industry innovations through our trade secret knowledge was a

50/50 intellectual property development partnership. CCI paid Qualtim its 50% portion of these invoices (See Exhibits 10, 11, true and correct copies are attached – subject to motion to seal to be filed with the Court). This was the origin of the work that became IP-LLC.

18. In September 2017, Suzi, Dan, and I had a formal strategic meeting regarding IP-LLC where we agreed that IP-LLC would hold the intellectual property that would be used by Paragon, DrJ and CCI. This was memorialized in a meeting agenda, subsequent graphics and an October 4, 2023 Paragon-TrussPal strategic planning document. (Exhibits 4, 12, 14, 21, true and correct copies are attached – subject to motion to seal to be filed with the Court.)

**FURTHER AFFIANT SAYETH NOT.**

Executed on October 1, 2024.

  
Kirk Grundahl